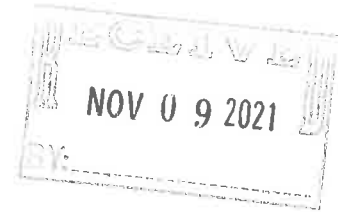


Exhibit A

State Court

Summons and Complaint

Case No. A-21-842555-C

Electronically Issued
10/14/2021 12:43 PM

1 **SUMM**
 2 **RAMZY P. LADAH, ESQ.**
 3 Nevada Bar No. 11405
 4 **LADAH LAW FIRM**
 5 517 S. Third Street
 6 Las Vegas, NV 89101
 7 litigation@ladahlaw.com
 8 T: 702.252.0055
 9 F: 702.248.0055
 10 *Attorneys for Plaintiff*

DISTRICT COURT**CLARK COUNTY, NEVADA**

LADAH LAW FIRM, PLLC,

Plaintiff,

vs.

CASE NO. A-21-842555-C

DEPT. NO. 24

CIVIL SUMMONS

12 ASLEY RODRIGUEZ-FUENTES;
 13 OSVALDO RODRIGUEZ; OFFICE OF THE
 14 DISTRICT ATTORNEY, CLARK COUNTY,
 15 FAMILY SUPPORT DIVISION; DESERT
 16 INSTITUTE OF SPINE CARE, LLC, a
 17 Domestic Limited-Liability Company; DCP
 18 INVESTMENT HOLDINGS, LLC, a
 19 Domestic Limited-Liability Company dba
 20 DCP HOLDINGS, LLC; SIMONMED
 21 IMAGING, INC., a Foreign Corporation;
 22 DANIEL L. BURKHEAD, M.D., LTD., a
 23 Domestic Professional Corporation, dba
 24 INNOVATIVE PROCEDURAL AND
 25 SURGICAL CENTER; DANIEL L.
 26 BURKHEAD, M.D., LTD., a Domestic
 27 Professional Corporation, dba INNOVATIVE
 28 PAIN CARE CENTER; CENTENNIAL
 MEDICAL GROUP, LLP, a Domestic
 Limited-Liability Partnership; MDS
 MEDICAL DEVICE SPECIALTY INC., a
 Domestic Corporation; ENRICO FAZZINI,
 D.O., PUEBLO MEDICAL IMAGING, LLC,
 a Domestic Limited-Liability Company;
 CORE REHAB COOPERATIVE, LLC, a
 Domestic Limited-Liability Company;
 SOUTHERN NEVADA MEDICAL GROUP
 LIMITED, a Domestic Limited-Liability
 Company; SIERRA MED SERVICES, a
 Domestic Company; CENTER FOR

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DISEASES AND SURGERY OF THE
SPINE; a Domestic Company; VEGAS
MEDICAL CENTER PLLC, a General
Partnership; NEURORADIUM, LLC, a
Domestic Limited-Liability Company;
PAYLATER PHARMACY, a Domestic
Limited-Liability Company; ANESTHESIA
AND INTENSIVE CARE SPECIALISTS,
LLP, a Domestic Limited-Liability
Partnership; FAMILY DOCTORS
RAMANATHAN, PLLC, a Domestic
Professional Limited-Liability Company dba
FAMILY DOCTORS OF GREEN VALLEY;
THE LEGAL FUNDING GROUP
(NEVADA), a Domestic Limited-Liability
Company; 5 STAR SETTLEMENTS, LLC, a
Foreign Limited-Liability Company; MONEY
FIRST LENDING LLC, a Domestic Limited-
Liability Company; PREFERRED CAPITAL
FUNDING - NEVADA, LLC, a Domestic
Limited-Liability Company; CENTERS FOR
MEDICARE & MEDICAID SERVICES,
DEPARTMENT OF U.S. TREASURY;
LOUIS MORTILLARO, PhD., RAXO
DRUGS, INC., a Domestic Corporation,

Defendants.

**NOTICE! YOU HAVE BEEN SUED. THE COURT MAY DECIDE AGAINST YOU
WITHOUT YOUR BEING HEARD UNLESS YOU RESPOND WITHIN 20 DAYS.
READ THE INFORMATION BELOW.**

TO DEFENDANT:

**CENTERS FOR MEDICARE & MEDICAID SERVICES, DEPARTMENT
OF U.S. TREASURY**

A civil Complaint has been filed by the Plaintiff against you for the relief set forth in the
Complaint.

1. If you intend to defend this lawsuit, within 20 days after this Summons is served
on you, exclusive of the day of service, you must do the following:

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(a) File with the Clerk of this Court, a formal written response to the Complaint in accordance with the rules of the Court. A \$223.00 filing fee is required.


(b) Serve a copy of your response upon the attorney whose name and address is shown below.

2. Unless you respond, your default will be entered upon application of the Plaintiff and failure to so respond will result in a judgment of default against you for the relief demanded in the Complaint, which could result in the taking of money or property or other relief requested in the Complaint.

3. If you intend to seek the advice of an attorney in this matter, you should do so promptly so that your response may be filed on time.

4. The State of Nevada, its political subdivisions, agencies, officers, employees, board members, commission members and legislators each have 45 days after service of this Summons within which to file an Answer or other responsive pleading to the Complaint.

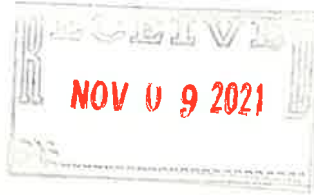
CLERK OF THE COURT

 Josefina San Juan 10/15/2021
Deputy Clerk Date

Respectfully submitted by:
LADAH LAW FIRM

/s/ Ramzy P. Ladah, Esq.

RAMZY P. LADAH, ESQ.
Nevada Bar No. 11405
517 S. Third Street
Las Vegas, NV 89101
Attorney for Plaintiff



Electronically Filed
10/12/2021 5:15 PM
Steven D. Grierson
CLERK OF THE COURT

Steven D. Grierson

CASE NO: A-21-842555-C
Department 24

CII
RAMZY P. LADAH, ESQ.
Nevada Bar No. 11405
LADAH LAW FIRM
517 S. Third Street
Las Vegas, NV 89101
Attorneys for Plaintiff

DISTRICT COURT
CLARK COUNTY, NEVADA

LADAH LAW FIRM, PLLC,

Plaintiff,

Case No.:
Dept. No.:

vs.

COMPLAINT IN INTERPLEADER

*Exempt from Arbitration
ADR Rule 3A: Equitable Relief*

ASLEY RODRIGUEZ-FUENTES;
OSVALDO RODRIGUEZ; OFFICE OF THE
DISTRICT ATTORNEY, CLARK COUNTY,
FAMILY SUPPORT DIVISION; DESERT
INSTITUTE OF SPINE CARE, LLC, a
Domestic Limited-Liability Company; DCP
INVESTMENT HOLDINGS, LLC, a
Domestic Limited-Liability Company dba
DCP HOLDINGS, LLC; SIMONMED
IMAGING, INC., a Foreign Corporation;
DANIEL L. BURKHEAD, M.D., LTD., a
Domestic Professional Corporation, dba
INNOVATIVE PROCEDURAL AND
SURGICAL CENTER; DANIEL L.
BURKHEAD, M.D., LTD., a Domestic
Professional Corporation, dba INNOVATIVE
PAIN CARE CENTER; CENTENNIAL
MEDICAL GROUP, LLP, a Domestic
Limited-Liability Partnership; MDS
MEDICAL DEVICE SPECIALTY INC., a
Domestic Corporation; ENRICO FAZZINI,
D.O.; PUEBLO MEDICAL IMAGING, LLC,
a Domestic Limited-Liability Company;
CORE REHAB COOPERATIVE, LLC, a
Domestic Limited-Liability Company;
SOUTHERN NEVADA MEDICAL GROUP
LIMITED, a Domestic Limited-Liability
Company; SIERRA MED SERVICES, a
Domestic Company; CENTER FOR
DISEASES AND SURGERY OF THE

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SPINE; a Domestic Company; VEGAS MEDICAL CENTER PLLC, a General Partnership; NEURORADIUM, LLC, a Domestic Limited-Liability Company; PAYLATER PHARMACY, a Domestic Limited-Liability Company; ANESTHESIA AND INTENSIVE CARE SPECIALISTS, LLP, a Domestic Limited-Liability Partnership; FAMILY DOCTORS RAMANATHAN, PLLC, a Domestic Professional Limited-Liability Company dba FAMILY DOCTORS OF GREEN VALLEY; THE LEGAL FUNDING GROUP (NEVADA), a Domestic Limited-Liability Company; 5 STAR SETTLEMENTS, LLC, a Foreign Limited-Liability Company; MONEY FIRST LENDING LLC, a Domestic Limited-Liability Company; PREFERRED CAPITAL FUNDING - NEVADA, LLC, a Domestic Limited-Liability Company; CENTERS FOR MEDICARE & MEDICAID SERVICES, DEPARTMENT OF U.S. TREASURY; LOUIS MORTILLARO, PhD., RAXO DRUGS, INC., a Domestic Corporation,

Defendants.

Plaintiff, LADAH LAW FIRM, PLLC, alleges as follows:

1. Plaintiff, LADAH LAW FIRM, PLLC, is a Nevada limited liability company, licensed and doing business in the County of Clark, State of Nevada as LADAH LAW FIRM.

2. Upon information and belief, Defendant, ASLEY RODRIGUEZ-FUENTES, is an individual residing in the County of Clark, State of Nevada.

3. Upon information and belief, Defendant, OSVALDO RODRIGUEZ, is an individual residing in the County of Clark, State of Nevada.

4. Upon information and belief, Defendant, OFFICE OF THE DISTRICT ATTORNEY, CLARK COUNTY, FAMILY SUPPORT DIVISION, is a Nevada State Agency, conducting and doing business in the County of Clark, State of Nevada.



1 5. Upon information and belief, Defendant, DESERT INSTITUTE OF SPINE
2 CARE, LLC, is a Domestic Limited-Liability Company, licensed and doing business in the
3 County of Clark, State of Nevada.

4 6. Upon information and belief, Defendant, DCP INVESTMENT HOLDINGS, LLC,
5 is a Domestic Limited-Liability Company dba DCP HOLDINGS, LLC, licensed and doing
6 business in the County of Clark, State of Nevada.

7 7. Upon information and belief, Defendant, SIMONMED IMAGING, INC., is a
8 Foreign Corporation, licensed and doing business in the County of Clark, State of Nevada.

9 8. Upon information and belief, Defendant DANIEL L. BURKHEAD, M.D., LTD.,
10 is a Domestic Professional Corporation, dba INNOVATIVE PROCEDURAL AND SURGICAL
11 CENTER, licensed and doing business in the County of Clark, State of Nevada.

12 9. Upon information and belief, Defendant DANIEL L. BURKHEAD, M.D., LTD.,
13 is a Domestic Professional Corporation, dba INNOVATIVE PAIN CARE CENTER, licensed and
14 doing business in the County of Clark, State of Nevada.

15 10. Upon information and belief, Defendant, PREFERRED CAPITAL FUNDING -
16 NEVADA, LLC, is a Domestic Limited-Liability Company, is licensed and doing business in the
17 County of Clark, State of Nevada.

18 11. Upon information and belief, Defendant, ENRICO FAZZINI, D.O., is licensed and
19 doing business in the County of Clark, State of Nevada.

20 12. Upon information and belief, Defendant, PUEBLO MEDICAL IMAGING, LLC,
21 is a Domestic Limited-Liability Company, licensed and doing business in the County of Clark,
22 State of Nevada.

23 13. Upon information and belief, Defendant, CORE REHAB COOPERATIVE, LLC,
24 is a Domestic Limited-Liability Company, licensed and doing business in the County of Clark,
25 State of Nevada.

26 14. Upon information and belief, Defendant, SOUTHERN NEVADA MEDICAL
27 GROUP LIMITED, is a Domestic Limited-Liability Company, licensed and doing business in the
28 County of Clark, State of Nevada.

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1 15. Upon information and belief, Defendant, SIERRA MED SERVICES, is a
2 Domestic Company, licensed and doing business in the County of Clark, State of Nevada.

3 16. Upon information and belief, Defendant, CENTER FOR DISEASES AND
4 SURGERY OF THE SPINE, is a Domestic Company, licensed and doing business in the County
5 of Clark, State of Nevada.

6 17. Upon information and belief, Defendant, VEGAS MEDICAL CENTER PLLC, is
7 a General Partnership, licensed and doing business in the County of Clark, State of Nevada.

8 18. Upon information and belief, Defendant, NEURORADIUM, LLC, is a Domestic
9 Limited-Liability Company, licensed and doing business in the County of Clark, State of Nevada.

10 19. Upon information and belief, Defendant, CENTER FOR DISEASES AND
11 SURGERY OF THE SPINE, is a Domestic Company, licensed and doing business in the County
12 of Clark, State of Nevada.

13 20. Upon information and belief, Defendant, PAYLATER PHARMACY, is a
14 Domestic Limited-Liability Company, licensed and doing business in the County of Clark, State
15 of Nevada.

16 21. Upon information and belief, Defendant, ANESTHESIA AND INTENSIVE
17 CARE SPECIALISTS, LLP, is a Domestic Limited-Liability Partnership, licensed and doing
18 business in the County of Clark, State of Nevada.

19 22. Upon information and belief, Defendant, FAMILY DOCTORS RAMANATHAN,
20 PLLC, a Domestic Professional Limited-Liability Company dba FAMILY DOCTORS OF
21 GREEN VALLEY, licensed and doing business in the County of Clark, State of Nevada.

22 23. Upon information and belief, Defendant, THE LEGAL FUNDING GROUP
23 (NEVADA), is a Domestic Limited-Liability Company, licensed and doing business in the
24 County of Clark, State of Nevada.

25 24. Upon information and belief, Defendant, 5 STAR SETTLEMENTS, LLC, is a
26 Foreign Limited-Liability Company, licensed and doing business in the County of Clark, State of
27 Nevada.

28

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1 25. Upon information and belief, Defendant, 5 STAR SETTLEMENTS, LLC, is a
2 Foreign Limited-Liability Company, licensed and doing business in the County of Clark, State of
3 Nevada.

4 26. Upon information and belief, Defendant, MONEY FIRST LENDING LLC, is a
5 Domestic Limited-Liability Company, licensed and doing business in the County of Clark, State
6 of Nevada.

7 27. Upon information and belief, Defendant PREFERRED CAPITAL FUNDING -
8 NEVADA, LLC, is a Domestic Limited-Liability Company, licensed and doing business in the
9 County of Clark, State of Nevada.

10 28. Upon information and belief, Defendant CENTERS FOR MEDICARE &
11 MEDICAID SERVICES, DEPARTMENT OF U.S. TREASURY, conducting and doing business
12 in the County of Clark, State of Nevada.

13 29. Upon information and belief, Defendant, LOUIS MORTILLARO, PhD., is
14 licensed and doing business in the County of Clark, State of Nevada.

15 30. Upon information and belief, Defendant RAXO DRUGS, INC., is a Domestic
16 Corporation, licensed and doing business in the County of Clark, State of Nevada.

17 31. The true names of DOES I through X, their citizenship and capacities, whether
18 individual, corporate associate, partnership or otherwise, are unknown to Plaintiff who therefore
19 sue these Defendants by such fictitious names. Plaintiff is informed and believes, and thereupon
20 alleges, that each of the Defendants designated herein as DOES have some lien, claim or right to
21 the settlement funds herein referred to.

22 32. Upon information and belief, Defendants, ASLEY RODRIGUEZ-FUENTES and
23 OSVALDO RODRIGUEZ, were represented by Plaintiff for personal injury claims in relation to
24 an accident that occurred in Clark County, Nevada on or about May 26, 2016. Plaintiff's
25 representation of Defendants, ASLEY RODRIGUEZ-FUENTES and OSVALDO RODRIGUEZ,
26 required various attorney's tasks including accumulating medical and other records; analyzing
27 those records; successfully negotiating settlement agreements and collecting the settlement
28



monies; filing a complaint, propounding and responding to discovery including depositions, and now filing an interpleader action to ask this Court to distribute those monies.

33. Defendant, ASLEY RODRIGUEZ-FUENTES's personal injury action was settled for a non-confidential amount totaling \$10,000. This amount was the negotiated, combined settlement amounts for Defendant, ASLEY RODRIGUEZ-FUENTES's injuries against the third-party tort-feasors, and Plaintiff was the attorney of record.

34. Defendant, OSVALDO RODRIGUEZ's personal injury action was settled for a non-confidential amount totaling \$10,000. This amount was the negotiated, combined settlement amounts for Defendant, OSVALDO RODRIGUEZ's injuries against the third-party tort-feasors, and Plaintiff was the attorney of record.

35. Upon information and belief, Defendant ASLEY RODRIGUEZ-FUENTES's medical providers, lending companies and others, have claims and liens against the settlement as follows:

a.	Clark County District Attorney - Family Division	\$ 1,183.52
b.	DCP Holdings	\$298,085.35
c.	Desert Institute of Spine Care	\$963.00
d.	SimonMed Imaging	\$2,628.60
e.	Innovative Procedural and Surgical Center	\$108,500.00
f.	Raxo Drugs	\$9,744.87
g.	Innovative Pain Care Center	\$38,897.70
h.	Centennial Medical Group	\$ 931.00
i.	Medical Device Specialty	\$1,193.00
j.	Enrico Fazzin, D.O.	\$5,038.00
j.	Pueblo Medical Imaging	\$3,000.00
j.	Core Rehab	\$4,616.00
k.	Southern Nevada Medical Group	\$2,725.00
l.	Sierra Med Services	\$3,500.00
m.	Center for Diseases and Surgery of the Spine	\$1,120.00
n.	Neuroradium	\$1,320.00
o.	Vegas Medical Center	\$900.00
p.	Paylater Pharmacy	\$4,286.08
q.	Anesthesia and Intensive Care Specialists	\$2,250.00
r.	Family Doctors of Green Valley	\$1,123.00

s.	The Legal Funding group	\$5,712.00
t.	5 Star Settlement	\$43,218.00
u.	Money First	\$27,921.96
v.	Preferred Capital Funding	\$239,291.38
	TOTAL LIENS	\$808,148.46

36. Upon information and belief, Defendant OSVALDO RODRIGUEZ's medical providers and a pre-settlement lending company have claims and liens against the settlement as follows:

a.	Paylater Pharmacy	\$ 28,879.59
b.	Raxo Drugs	\$ 101.10
c.	Core Rehab	\$7,700.00
d.	Enrico Fazzini, D.O.	\$3,525.00
e.	SimonMed	\$9,609.28
f.	Louis Mortillaro, PhD	\$4,250.00
g.	Southern Nevada Medical	\$2,525.00
h.	Innovative Pain Care	\$10,947.20
i.	Nevada Anesthesia Consultants	\$1,400
j.	5 Star Settlement	\$39,220.00
k.	Preferred Capital Funding	\$15,529.88
l.	CENTERS FOR MEDICARE & MEDICAID SERVICES	\$4,701.29
	TOTAL LIENS	\$128,388.34

37. Upon information and belief, Defendants, OFFICE OF THE DISTRICT ATTORNEY, CLARK COUNTY, FAMILY SUPPORT DIVISION; and CENTERS FOR MEDICARE & MEDICAID SERVICES, DEPARTMENT OF U.S. TREASURY, hold priority liens.

38. Defendants do, or may assert multiple, conflicting claims to the above-described monies in an amount in excess of the limits recovered.



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1 39. The foregoing claims of Defendants are conflicting, and Plaintiff is unable to
2 determine which of the respective claims is valid or to whom, if anyone, the money may be paid
3 without risking double or multiple liability.

4 40. The claims and debts asserted by lienholders are disputed, excessive, invalid
5 and/or not related to the subject interpleader funds.

6 41. Plaintiff has incurred and will incur costs and attorney fees in connection with
7 these proceedings.

8 WHEREFORE, Plaintiff prays for judgment against the Defendants, and each of them, as
9 follows:

10 1. That the Defendants be ordered to interplead and litigate their claims to the above-
11 described money;

12 2. That judgment be entered precluding the Defendants from any recovery
13 whatsoever regarding the charges incurred as a result of the subject incident which gave rise to the
14 instant Complaint in Interpleader;

15 3. That the Defendants be restrained, until further order of this court, from instituting
16 or further prosecuting any other proceeding against Plaintiff or the injured party in any court
17 affecting the rights and obligations between the parties to this action;

18 4. That all debts owed to the Defendants shall be discharged in full from the
19 interplead funds;

20 5. That all amounts owed to any Defendants shall be discharged as well and neither
21 Plaintiff nor the injured party shall be obligated to pay Defendants any amount for treatment
22 related to the underlying claim;

23 6. That Plaintiff be permitted to litigate its claim to the above described money or
24 liability to all of the named and un-named Defendants, DOES I through X, and be otherwise
25 discharged from all liability to all Defendants with respect to the above described money;

26
27 //

28 //

1
2 7. Plaintiff be awarded costs and reasonable attorney fees to be determined by the
3 court; and

4 8. Other relief the court deems just and proper.

5 DATED this 12th day of October, 2021

6 **LADAH LAW FIRM**

7 */s/ Ramzy P. Ladah*

8 **RAMZY P. LADAH, ESQ.**

9 Nevada Bar No. 11405

10 517 S. Third Street

11 Las Vegas, NV 89101

12 *Attorneys for Plaintiff*

